

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:

RIC (LAVERNIA) LLC,

Debtor

Case No. 24-51195-mmp

Chapter 11

RIC (LAVERNIA) LLC,

Plaintiff

Adversary No. 24-05043-mmp

v.

**MILESTONE CAPITAL CRE 1, LLC;
LORI DAVES AND JOHN DAVES, AS
SUBSTITUTE TRUSTEE; ANDRES
CEDILLOS,**

Defendants

FIRST AMENDED NOTICE OF DEPOSITION OF JENNIFER MACGEORGE

PLEASE TAKE NOTICE that, pursuant to Federal Rules of Bankruptcy Procedure 7030 and 7034 and Federal Rules of Civil Procedure 30 and 34, Plaintiff RIC (Lavernia), LLC (“Plaintiff”) will take the oral deposition of non-party Jennifer MacGeorge beginning at **9:30 a.m. CT on April 3, 2025**. The deposition will be taken remotely. Additionally, Plaintiff requests that Jennifer MacGeorge produce documents by **9:30 a.m. CT on April 3, 2025**. A copy of the subpoena compelling Jennifer MacGeorge’s oral deposition and the production of documents is attached hereto as Exhibit 1.

The documents should be produced in accordance with Exhibit A of the attached subpoena. The documents should be produced to U.S. Legal Support, Inc., at 16825 Northchase Dr., Suite

800, Houston, TX 77060 or via email to justin.hanna@bclplaw.com on or before 9:30 a.m. CT on April 3, 2025.

The deposition will be recorded by stenographic means and may be recorded by video before an officer authorized to administer oaths, and will continue day to day until completed. Exhibit B of the attached subpoena provides additional information regarding the deposition. All parties are invited to attend and examine the witness as prescribed by the Federal Rules of Civil Procedure.

Dated: March 17, 2025

Respectfully submitted,

BRYAN CAVE LEIGHTON PAISNER LLP

/s/ Justin D. Hanna

Kyle S. Hirsch

Texas Bar No. 24117262

Justin D. Hanna

Texas Bar No. 24095726

2200 Ross Ave., Suite 4200W

Dallas, Texas 75201

(214) 721-8000 (Telephone)

(214) 721-8100 (Facsimile)

kyle.hirsch@bclplaw.com

justin.hanna@bclplaw.com

**ATTORNEYS FOR PLAINTIFF RIC
(LAVERNIA) LLC**

CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2025, a copy of the foregoing document was served via email through the ECF system on the following counsel of record:

George H. Spencer, Jr. and Natalie F. Wilson
Langley & Banack, Inc.
gspencer@langleybanack.com
nwilson@langleybanack.com
Attorneys for John and Lori Daves

Kell C. Mercer
KELL C. MERCER, P.C.
kell.mercer@mercerc-law-pc.com
Attorney for Defendants Milestone Capital CRE 1, LLC and Andres Cedillos

Peter J. Stanton
The Law Offices of Peter J. Stanton
stanton@pstantonlaw.com
Attorney for Defendant Milestone Capital CRE 1, LLC

Erin Coughlin
Office of the United States Trustee
erin.coughlin@usdoj.gov

/s/ Justin D. Hanna

Justin D. Hanna